

SEALED

JTW: 03.28.24
USAO#2023R00416

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

LINNARD WORTHAM,

Defendant.

UNDER SEAL

Criminal no. JTB 24cr109

**(Possession with Intent to Distribute
Controlled Substances, 21 U.S.C.
§ 841(b)(1)(A); Forfeiture, 21 U.S.C.
§ 853).**

INDICTMENT

COUNT ONE

Possession with Intent to Distribute Controlled Substances

The Grand Jury for the District of Maryland further charges:

On or about October 11, 2023, in the District of Maryland, the defendant,

LINNARD WORTHAM,

did knowingly and intentionally possess with intent to distribute at least 5 kilograms or more of a mixture or substance containing a detectible amount of cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1) and § 841(b)(1)(A)

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 21 U.S.C. § 853 in the event of the defendant's conviction under Count One of this Indictment.

Narcotics Forfeiture

2. Upon conviction of the offense alleged in Count One of the Indictment, the defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a):

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense; and
- b. any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

Property Subject to Forfeiture

3. The property to be forfeited includes, but is not limited to, the following:
- a. a forfeiture money judgment in the appropriate amount.

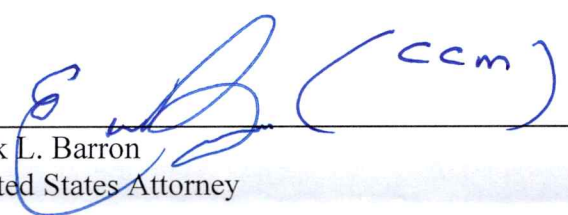
Substitute Assets

4. If any of the property described above, as a result of any act or omission of the defendant,
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or,

e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property described above, pursuant to 21 U.S.C. § 853(p).

21 U.S.C. § 853


Erik L. Barron
United States Attorney

SIGNATURE REDACTED

Foreperson 

4/4/2024
Date